



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Ian Locke
Environmental Health and Safety Manager
Chevron Products Company, Pascagoula Refinery
250 Industrial Road
Pascagoula, Mississippi 39581
Ian.Locke@chevron.com

Dear Mr. Locke:

Pursuant to Section 114(a)(1) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a)(1), you are hereby required to provide the U.S. Environmental Protection Agency with information relating to the Chevron Pascagoula Refinery (Chevron) located at 250 Industrial Road in Pascagoula, Mississippi. This information is needed to determine whether Chevron is in compliance with requirements of the Act and its implementing regulations. Section 114(a) of the Act, 42 U.S.C. § 7414(a), authorizes the Administrator of the EPA to require any person who owns or operates an emission source, whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the Act, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the Act. This authority has been duly delegated to the Director of the Enforcement and Compliance Assurance Division, Region 4.

Please review and follow the instructions in and, where required, complete the following enclosures: Instructions (Enclosure 1), Definitions (Enclosure 2), Claiming Confidentiality (Enclosure 3), Information Request (Enclosure 4), and Statement of Certification (Enclosure 5).

The requested information shall be submitted to the EPA electronically, per the instructions in Enclosure 1. The responses shall be submitted **no later than 30 calendar days** after Chevron's receipt of this letter as determined by the date of the EPA's electronic mail transmitting this request unless the EPA, for good cause shown, extends the deadline in writing for responding to this request. This information must be submitted electronically to the following individual:

Stephen Rieck
Environmental Scientist
Air Enforcement Branch
Enforcement and Compliance Division
U.S. Environmental Protection Agency, Region 4
Rieck.Stephen@epa.gov

Failure to provide the information required by this letter is a violation of the Act and may result in one or more of the following actions: (1) issuance of an order requiring compliance with this request; (2) issuance of an administrative penalty order pursuant to Section 113(d) of the Act, 42 U.S.C. § 7413(d);

(3) commencement of a civil action in accordance with Sections 113(b) of the Act, 42 U.S.C. § 7413(b); and/or (4) any other action authorized under the Act.

Under Section 114(c) of the Act, 42 U.S.C. § 7414(c), and pursuant to the regulations found at 40 C.F.R. Part 2, Subpart B, including 40 C.F.R. § 2.301, you are entitled to assert a claim of business confidentiality for any information you provide to the EPA that involves trade secrets and which Chevron regards as confidential business information (CBI). For such information, you may request that the EPA treat such information as confidential. Any such claim of confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). Note that “emission data,” as defined by 40 C.F.R. § 2.301(a)(2), cannot be claimed as confidential under Section 114(c) of the Act, 42 U.S.C. § 7414(c). For detailed instructions for claiming confidentiality, please see Enclosure 3. Information you supply under a claim of confidentiality will be treated in accordance with 40 C.F.R. Part 2, Subpart B, and will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to Chevron. Please note that any confidentiality claim does not obviate the need to send that portion of the response to the EPA.

The response to the information requested must be accompanied by Enclosure 5, Statement of Certification, which is to be signed and dated by a responsible official of Chevron. This statement certifies that the response submitted to the EPA is complete and contains all documents and information responsive to this request that are known to you, following a complete and thorough review of all information and sources available to you.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 – 3520, because it seeks information from specific individuals or entities as part of an investigation.

If you have any questions regarding this matter, please contact Stephen Rieck at (404) 562-9177 or by email at Rieck.Stephen@epa.gov.

Sincerely,

for

Carol L. Kemker
Director
Enforcement and Compliance Assurance Division

Enclosures: 1 – Instructions
 2 – Definitions
 3 – Claiming Confidentiality
 4 – Information Request
 5 – Statement of Certification

cc: Tyler Hardy, Mississippi Department of Environmental Quality

ENCLOSURE 1

Instructions

Each of the following instructions applies to each and every Request contained in Enclosure 4.

1. Provide a separate response to each and every Request, and each and every subpart of a Request.
2. If the company has no responsive information or documents pertaining to a particular Request, submit an affirmative statement and explanation.
3. Indicate on each document produced, or in some other reasonable manner, the number of the Request to which it corresponds. If a document is responsive to more than one Request, this must be so indicated and only one (1) version of the document needs to be provided.
4. The company shall submit documents in Portable Document Format (PDF) or in any other electronic format as specified in Enclosure 4. Do not create separate PDF files for each page of a single document.
5. Identify each person whom you relied on or consulted with in preparing your responses to each Request. Provide their name, title, job duties and duration of employment with the company. If they are not an employee of the company, identify their employer and provide their name, title, job duties and duration of employment with their employer.
6. If requested information or documents are not known or are not available to you at the time of your response to this information request, but later become known or available to you, you must supplement your response to the EPA within 30 calendar days of discovery of the responsive information. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete or misrepresents the facts, you must provide the EPA with a corrected response as soon as possible.
7. Please submit your response to this information request to the EPA electronically. You may submit your response using either of the following options: (A) As an attachment sent via email to Mr. Stephen Rieck at Rieck.Stephen@epa.gov; or (B) by requesting a link from the EPA for a secure file transfer site where you may upload your response. You may request a link by sending an email to Stephen Rieck at Rieck.Stephen@epa.gov.
8. Please do not submit compressed files (.zip) via email. If you wish to submit compressed files, please select option B.
9. Please do not send documents that you have claimed as confidential business information (CBI) to the EPA by email (option A). If you are submitting documents that you have claimed as CBI, please upload them to the EPA's secure file transfer site (option B).
10. Prior to submitting your response, please send an email to Stephen Rieck at Rieck.Stephen@epa.gov indicating which option or combination of options (A and/or B) you have selected to submit your response to this request.

ENCLOSURE 2

Definitions

1. The terms “**document**,” “**writing**,” “**record**” and the plural forms thereof shall mean all written, recorded or graphic matters, however produced or reproduced, of every kind and description, pertaining in any way to the subject matter of this request, and which are in the company’s possession, custody or control or to which the company has or has had access. The terms “document” and “writing” shall include, but are not limited to: any receipts; invoices; shipping records; purchase orders; purchase records; books; pamphlets; periodicals; memoranda (including those of telephone or oral conversations); contracts; correspondence; agreements; applications; financial records; security instruments; disbursements; checks; bank statements; time records; accounting or financial records; notes; diaries; logs; facsimiles (faxes); telegrams or cables prepared, drafted, received or sent; electronic mail (email), whether drafted, received or sent; tapes; transcripts; recordings; minutes and notes of meetings; directives; work papers; charts; drawings; prints; flow sheets; photographs; infrared camera recordings; film; computer printouts; x-ray photographs; advertisements; catalogs; data; sampling reports, plans, protocols, reports, analyses; or any handwritten, recorded, transcribed punched, taped, filmed or graphic matter, however produced or reproduced.
2. The terms “**person**” and/or “**persons**” shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.
3. The terms “**relate to**” and/or “**pertain to**” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
4. The terms “**you**” and/or “**your**” shall mean Chevron, and all its agents, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, and contractors. These terms shall also mean any others who are not listed above and are in possession, custody, or control (actual or constructive) of information relevant to this request or information that is otherwise available to Chevron, or who may have obtained information for or on behalf of Chevron.

All terms not defined in this enclosure have their ordinary meaning, unless such terms are defined in the Clean Air Act and/or its implementing regulations, and in which case the statutory and/or regulatory definitions apply. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions. The terms “and” and “or” shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.

ENCLOSURE 3

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering part or all of the information, other than emissions data and information or data that is otherwise publicly available, as described in 40 C.F.R. § 2.203(b). If no business confidentiality claim accompanies the information when it is received by the EPA, the EPA may make the information available to the public without further notice. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any information over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret” or “proprietary” or “business confidential” and a date if any when the information should no longer be treated as confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. Information covered by such a claim will be disclosed by the EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Act, and 40 C.F.R. Part 2, Subpart B. The EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as “Personal Privacy Information” given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. Part 2, Subpart B.¹ You bear the burden of substantiating your confidentiality claim and must satisfactorily show, among other things, that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that the information is not, and has not been, reasonably obtainable by legitimate means without your consent. Conclusory allegations will be given little or no weight.

Before the EPA makes a final determination regarding your claim of confidentiality, pursuant to 40 C.F.R. Part 2, Subpart B, the EPA will send you a letter asking you to substantiate fully your CBI claim by answering several questions. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to meet the requirements so as to be entitled to confidential treatment. You must provide the EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and the EPA may release the information.

¹ 40 C.F.R. § 2.208(e) conflicts with the holding in *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019) (*Argus Leader*). In light of the *Argus Leader* decision, the Agency will not consider 40 C.F.R. § 2.208(e) in this determination. The Agency anticipates amending 40 C.F.R. § 2.208 so that it is consistent with the decision in *Argus Leader*.

The EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Please note that if a page, document, group or class of documents claimed by you to be confidential contains a significant amount of information which the EPA determines is not confidential, your confidentiality claim regarding that page, document, group or class of documents may be denied. For each item or class of information that you identify as being confidential, the EPA will ask you to answer the following questions, giving as much detail as possible, as conclusory allegations will be given little or no weight in the EPA's determination:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? If so, specify which.
5. Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
6. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, please explain whether the information is the kind that would customarily not be released to the public.
8. Whether you assert the information as voluntary or involuntary, please address why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.
9. If you believe any information to be (a) trade secret (s), please so state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret (s).
10. Explain any other issue you deem relevant (including, if pertinent, reasons why you believe that the information you claim to be CBI is not emission data or effluent data).

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is *not* entitled to confidential treatment under Section 114(c) of the Act, 42 U.S.C. § 7414(c) or 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emission of any substance into the air - (A) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing; (B) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and (C) a general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Information designated confidential will be disclosed by EPA only to the extent allowed by, and by means of procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

ENCLOSURE 4

Information Request

Please provide the following information using the instructions and definitions provided in Enclosures 1 and 2. A response must be sent to the EPA no later than 30 calendar days after Chevron receives this request.

Benzene Waste Operations NESHAP (BWON) and Leak Detection and Repair (LDAR)

1. Provide the Chevron LDAR database from January 1, 2021, to present. The database should be provided in a .bak format.
2. Provide a copy of the 2021 Total Annual Benzene report required by 40 C.F.R. § 61.357.
3. Provide the most recent Title V permit renewal application.
4. Provide the following information for the carbon adsorption units used to control emissions from the API oil/water separators #1, #2, #6, and #7 from January 1, 2019, to present:
 - a. Carbon adsorption unit model and manufacturer;
 - b. Maintenance and repair records associated with the carbon adsorption units;
 - c. Carbon canister design and manufacturer;
 - d. Design carbon replacement interval; and
 - e. Device monitoring schedule as required by 40 C.F.R. § 61.354(d).
5. For the carbon adsorption units discussed in Question 4, provide the following information regarding the determination of the design carbon replacement interval:
 - a. Describe how the design carbon replacement interval was determined;
 - b. Work orders, calculations and testing associated with the determination; and
 - c. Maximum flow rate and VOC concentration measured when making the determination.
6. As required by 40 C.F.R. § 61.349(a)(2)(iv), provide the following information for the Enhanced Biological Unit (EBU) used to control the Dissolved Nitrogen Floatation Units:
 - a. Test data and design information that documents the EBU will achieve an emission control efficiency of either 95 percent or greater for organic compounds or 98 percent or greater for benzene;
 - b. Description of operating parameters used to achieve the emission control efficiency;
 - c. Submittal of information and data to the Administrator for use of an alternate control device; and
 - d. Determination from the Administrator that the EBU meets the requirements of 40 C.F.R. § 61.349.
7. Review of Chevron LDAR data for API oil/water separator #1 indicate a first attempt at repair for approximately 16 components all occurred on February 26, 2020, at 12:00 am. Similarly, data for API oil/water separator #2 indicate a first attempt at repair for approximately 20 components all occurred on February 27, 2020, at 12:00 am. Regarding these events:
 - a. Provide an explanation why attempts at repair are recorded at the same time for multiple components; and

- b. Provide a copy of any project plans, work orders, and other records that discuss these attempts at repair.
8. Review of Chevron LDAR records for API oil/water separators indicate leaking components were placed on the delay of repair list. The records indicate many of the API separator components were repaired by caulking or tightening of bolts. Provide the following information:
 - a. Dates that API Separators #1, #2, #6, and #7 were shut down to conduct repairs of leaking components;
 - b. Project plans, work orders, or other records that discuss repairs conducted during the unit shutdowns; and
 - c. For components repaired during the shutdown by means of caulking or tightening of bolts, provide an explanation as to why repair of these components was technically impossible without a complete or partial unit shutdown.
9. Please provide records of any root cause analyses and corrective action(s) performed pursuant to 40 C.F.R. § 63.658 from January 1, 2018, to present.

Marine Vapor Recovery Units (MVRUs)

10. For the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), provide the benzene lean oil absorber monitoring plan required by the State of Mississippi Air Pollution Control Title V Permit to Operate Air Emissions Equipment, No. 1280-00058, Oct. 1, 2009 ("Permit"), Condition No. 5.AZ.1.20, and 40 C.F.R. § 61.303(e).
11. For the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), and AZ-002 (MVR-C at Berth 6), provide the engineering report required by Permit Condition No. 5.AZ.1.1, and 40 C.F.R. § 63.567(f), including a detailed description of the vent system or vapor collection system used to vent each vent stream to a control device, all valves and vent pipes that could vent the stream to the atmosphere (thereby bypassing the control device), and which valves are car-sealed opened and which valves are car-sealed closed.
12. For the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), and AZ-002 (MVR-C at Berth 6), provide the baseline liquid flow to vapor flow (L/V) ratio operating parameter (calculated value of the inlet liquid flow divided by the inlet gas flow to the absorber averaged over three test runs) per requirements set forth at 40 C.F.R. § 63.563(b)(8)(ii) and Permit Condition No. 5.AZ.1.7.
13. For the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), and AZ-002 (MVR-C at Berth 6), provide the following information from January 1, 2019, to the present:
 - a. Bypass monitoring records for each loading operation and at least monthly, and all times when maintenance is performed on car-sealed valves, when the car-seal is broken, and when the valve position is changed, pursuant to 40 C.F.R. § 63.563(a)(1) and Permit Condition No. 5.AZ.1.2;
 - b. Records of the inlet liquid flowrate, the inlet gas flowrate to the absorber, and the calculated L/V ratio, per 40 C.F.R. § 63.564(i)(2) and Permit Condition No. 5.AZ.1.8;
 - c. Excess emissions reports and all records of performance tests, per 40 C.F.R. § 63.567(e)(1) and Permit Condition No. 5.AZ.1.9;
 - d. Records of HAP emission estimates per 40 C.F.R. § 63.563(b)(10) and Permit Condition No. 5.AZ.1.10;

- e. Records of all measurements, calculations, and other documentation used to identify commodities exempted under § 63.560(d), per the requirements in 40 C.F.R. § 63.567(j)(1) and Permit Condition No. 5.AZ.1.11;
 - f. Records of the emission estimation calculations performed according to 40 C.F.R. § 63.565(l), per 40 C.F.R. § 63.567(j)(2) and Permit Condition No. 5.AZ.1.12;
 - g. Annual reports (for 2019, 2020 and 2021) of the source's HAP control efficiency calculated using the procedures specified in § 63.565(l), based on the source's actual throughput, per 40 C.F.R. § 63.567(j)(3) and Permit Condition No. 5.AZ.1.13;
 - h. Records of the emissions estimates determined in 40 C.F.R. § 63.565(l) and records of actual throughputs by commodity, per 40 C.F.R. § 63.567(j)(4) and Permit Condition No. 5.AZ.1.14;
 - i. Records of annual leak detection and repair (inspection and monitoring of all ductwork and piping and connections to vapor collection systems and control devices once each calendar year using Method 21), per 40 C.F.R. § 63.563(c)(1) and Permit Condition No. 5.AZ.1.15;
 - j. Records of ongoing leak detection and repair (including when evidence of a potential leak was found by visual, audible, olfactory, or any other detection method, records of the inspections of all ductwork and piping and connections to vapor collection systems and control devices to the extent necessary to positively identify the potential leak, records of any potential leaks being monitored within 5 days by Method 21, and records demonstrating the leak was tagged until repaired), per 40 C.F.R. § 63.563(c)(2) and Permit Condition No. 5.AZ.1.16;
 - k. Records of leak repair efforts when a leak was detected, per 40 C.F.R. § 63.563(c)(3) and Permit Condition No. 5.AZ.1.17;
 - l. Leak detection and repair records required pursuant to 40 C.F.R. § 63.567(k) and Permit Condition No. 5.AZ.1.18; and
 - m. Records of emissions levels, and the monitoring of such emissions, during the approved maintenance allowance per 40 C.F.R. § 63.562(b)(6), (c)(6), Permit Condition No. 5.AZ.1.19, and the 10/29/1999 MDEQ letter (see Permit Appendix E).
14. For the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), and AZ-002 (MVR-C at Berth 6), provide stack test reports where L/V was established, except for those dated 12/27/1999 and 2/18/2000.
 15. For the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), and AZ-002 (MVR-C at Berth 6), provide the operator's manual or specifications describing the operation of the control device and the process parameter(s) that indicate proper operation and maintenance of the device.
 16. Provide an explanation and all relevant documents regarding the cause(s) of elevated benzene emissions detected in the vicinity of the absorbers at AZ-001 (MVR-A and MRV-B at Berths 2-5) by fence line monitoring during the time periods of August 23 through September 6, 2018, April 17 through May 16, 2019, July 11 through July 25, 2019, and January 22 through February 5, 2020, GMAP data recorded on April 4, 2021, and optical gas imaging (OGI) recorded on April 20 and May 14, 2021.
 17. Data from April 20, 2021, indicate a problem with the monitoring of the inlet liquid flowrate and the inlet gas flowrate to the absorbers at AZ-001 (MVR-A and MVR-B at Berths 2-5), and a

failure to maintain associated records. Provide an explanation and all documents regarding these monitoring and recordkeeping problems and identify any corrective actions that have already been taken.

Loading Racks

18. For the tank truck loading racks at CG-002 (Plant 5171, Pascagoula Marketing Terminal), provide the following information since January 1, 2019, required by the Permit and 40 C.F.R. part 63, subpart R and 40 C.F.R. part 63, subpart XX:
 - a. Daily and annual product throughput records, per Permit Condition No. 5.CG.2.17;
 - b. Exhaust stream continuous monitoring records required by 40 C.F.R. § 63.427(a)(1) and Permit Condition No. 5.CG.2.1;
 - c. Monitoring and leak inspection records per 40 C.F.R. § 63.428(c)(1) and Permit Condition No. 5.CG.2.2;
 - d. Tank truck vapor tightness testing records per 40 C.F.R. § 63.428(b) and Permit Condition No. 5.CG.2.8;
 - e. Leak inspection records using sight, sound and smell, per 40 C.F.R. § 63.424(a) and Permit Condition No. 5.CG.2.3;
 - f. The logbook prescribed by 40 C.F.R. § 63.424(b) and Permit Condition No. 5.CG.2.4 including documentation showing the location of all equipment in gasoline service at the facility and the list of equipment in gasoline service for which the monthly inspection required by 40 C.F.R. § 63.424(a) and Permit Condition No. 5.CG.2.3 are conducted;
 - g. Periodic reports required by 40 C.F.R. § 63.428(g), (h) and Permit Condition Nos. 5.CG.2.9 and 5.CG.2.10;
 - h. Vapor collection system pressure monitoring records including pressure records from performance tests and other monitoring records that demonstrate pressures do not exceed 4,500 pascals (450 mm of water) during product loading; and,
 - i. Records of leaks found, including repair records and delay of repair records, per 40 C.F.R. § 63.424(c), (d), (e) and Permit Condition Nos. 5.CG.2.5, 5.CG.2.6 and 5.CG.2.7.
19. For the tank truck loading racks at CG-002 (Plant 5171, Pascagoula Marketing Terminal), provide:
 - a. The vapor collection system manufacturer, model and date installed; and
 - b. All performance test reports, and the notification of compliance status required under 40 C.F.R. § 63.9(h), including all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter values under 40 C.F.R. § 63.425(b).
20. For the tank truck loading racks at CG-002 (Plant 5171, Pascagoula Marketing Terminal), provide a description of actions taken, including mechanical and electronic systems and any standard operating procedures, to assure that loadings of gasoline into tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system, as required by 40 C.F.R. § 60.502(f).
21. For the tank truck loading racks at CG-002 (Plant 5171, Pascagoula Marketing Terminal), provide a description of actions taken (including records contained in mechanical and electronic

systems), as well as any standard operating procedures, to assure that the terminal's and the tank truck loading rack's vapor collection systems are connected during each loading of a gasoline tank truck at the truck loading racks as required by 40 C.F.R. § 60.502(g).

22. GMAP monitoring data indicates that on April 20, 2021, from 9:24am - 9:41am, the tank truck loading racks at CG-002 emitted elevated levels of VOCs. Provide an explanation, with supportive information, as to the cause of these elevated emissions, and identify any corrective actions that have already been taken.

Pipe Rack Spill

23. Regarding the Pipe Rack Spill Emissions detected by EPA's GMAP and optical gas imaging on April 20 and 21, 2021, coming from the area 4 pump pad within the pipe rack area north of N Street and between Blending East Road and Blending Central Road, associated with a disconnected sample drain line from an engine testing facility, provide:
- a. Estimated volume of liquids spilled;
 - b. Estimated concentration of each HAP including benzene in liquids spilled;
 - c. Estimated emissions of VOC and each HAP including benzene associated with spill;
 - d. Calculation example indicating how the VOC and HAP emissions associated with the spill were estimated; and,
 - e. Spill cleanup records including work orders and records of any monitoring conducted to ensure or demonstrate that cleanup was complete.

Coker and Fin Fan Area

24. Regarding the coker fin fan area including fin fans (E8301 A through R, E8302 A and B, E8328 A1, A2, B1, B2), provide:
- a. Piping and instrumentation diagrams; and,
 - b. Maintenance records to address emissions from fin fan area including leak repairs since January 1, 2019 and, for all instances since January 1, 2019, records that any fin fan bay was taken out of service for maintenance or inspection.
25. For the delayed coking unit decoking operations since January 1, 2019 that are subject to 40 C.F.R. § 63.657, provide:
- a. The average pressure or temperature, as applicable, for the 5-minute period prior to venting to the atmosphere, draining, or deheading the coke drum for each cooling cycle for each coke drum;
 - b. If complying with the 60-cycle rolling average, each 60-cycle rolling average pressure or temperature, as applicable, considering all coke drum venting events in the existing affected source; and
 - c. For double-quench cooling cycles:
 - (A) The date, time and duration of each pre-vent draining event;
 - (B) The pressure or temperature of the coke drum vessel, as applicable, for the 5-minute period prior to the pre-vent draining; and
 - (C) The drain water temperature at 1-minute intervals from the start of pre-vent draining to the complete closure of the drain valve.

MVRU Sump

26. Regarding the MVRU Sump, provide:

- a. Piping and instrumentation diagrams for the MVRU Sump;
- b. Design drawings for the MVRU Sump depicting inlet and outlet, cover, cover openings, liner, seals and emissions points;
- c. Is the MRVU Sump identified in the Permit as AZ-010 Product Dock VRU Fixed-roof Wastewater Sump with a closed-vent system controlled by a carbon canister?
 - i. If yes, provide:
 - A. Cover and closed vent system inspection and repair records required by 40 C.F.R. § 61.349, for the time period commencing January 1, 2019, to present;
 - B. Carbon adsorption unit model and manufacturer;
 - C. Maintenance and repair records associated with the carbon adsorption units from January 1, 2019, to present;
 - D. Carbon canister design and manufacturer;
 - E. Design carbon replacement interval;
 - F. Device monitoring schedule as required by § 61.354(d); and
 - G. The following information regarding the determination of the design carbon replacement interval:
 - a. Describe how the design carbon replacement interval was determined;
 - b. Work orders, calculations and testing associated with the determination; and,
 - c. Maximum flow rate and VOC concentration measured when making the determination.
 - ii. If no, provide a description of the MVRU Sump and air emissions controls delineating whether it is a fixed roof tank, a floating roof tank or a surface impoundment, based on the cover, materials of construction and whether any non-earthen materials of construction provide structural support.
- d. Records for each calendar year commencing January 1, 2019, indicating the amount of liquids and total amount of benzene that flowed through the MVRU Sump from the following sources:
 - i. C-4510 (absorber);
 - ii. Vapor Line Dip Leg;
 - iii. Low point drains on detonation arrestors and blowers (K-45153, K-45353, K-45102A, K-45102B, K-45102C, K-4595A, K4595B, K4595C);
 - iv. P-45115;
 - v. LCV0440, TCV0444;
 - vi. C-4520 (stripper);
 - vii. D-4520 (stripper hot overhead accumulator);
 - viii. D-4521 (stripper cold overhead accumulator);
 - ix. P-45120 (reflux pump); and,
 - x. P-45121 (recovered product pump).

ENCLOSURE 5

STATEMENT OF CERTIFICATION

I certify that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my personal inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001, 1341 and 1505.

(Signature)

(Printed Name)

(Title)

(Date)